

UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

Case No. 2:24-cv-00379

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CLERK U S DISTRICT COURT DISTRICT OF ARIZONA	
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COMPLAINT IN INTERPLEADER

Transamerica, Plaintiff,

v.

Tayjalaya S. Williams, Defendant.

Tayjalaya S Williams

2240 S Elks Lane

Yuma, AZ 85364, Unit 13

Email: Tayjalayastormwilliams@gmail.com

March 20th, 2024

Pro Se: RESPONSE TO SUMMONS

To the Honorable Court and opposing counsel:

I, Tayjalaya S. Williams, representing pro se above-captioned matter, and do not have an attorney to represent me." hereby submit my response to the summons served upon me.

I acknowledge receipt of the summons and accompanying documents and Exhibits listed (1.A - F) related to the beneficiary designation dispute concerning Thomas Retzlaff's insurance policy.

I affirm that I am the individual named as a Defendant in this matter.

MEMORANDUM OF POINTS AND AUTHORITIES

Admit or Deny

1. I admit that I am listed as the sole beneficiary of the life insurance policy.
2. I deny the allegation regarding uncertainty about the signature's validity before the insured's passing.
3. I deny being listed as a prime suspect in late husband's case.

I. Parties

Interpleader Defendants

- Tayjalaya S. Williams, Collin Retzlaff, Brittany Retzlaff, Denise Hollas

Interpleader Plaintiff

- Transamerica life insurance company.

II. Facts

A. The beneficiary designation made by my late husband Thomas Retzlaff in the insurance policy is disputed.

B. Thomas Retzlaff's insurance policy, signed on **August 21st 2018 (Exhibit A)**, originally did not list me as a beneficiary.

C. Subsequent beneficiary designations, particularly the final one designating me as the sole 100% beneficiary, were executed on August 28th 2021, the **same day** Thomas and I had got married (**Exhibit 1.A and Exhibit B**).

D. Thomas Retzlaff expressed concerns about harassment towards me and my family in text messages dated August 8th 2021. **Attributing it to Collin Retzlaff doing (Exhibit D).**

E. Thomas Retzlaff's emails dated June 22ND 2021, expressed fears for his life and urgency in getting married to ensure my financial security **(Exhibit F).**

F. Innocence in Ongoing Investigations: Despite 3 year ongoing investigation into Thomas Retzlaff's homicide, I maintain my innocence and have not been formally charged or convicted in connection with the crime.

G. Second to last Beneficiary Designation change with me (Tayjalaya) at 75% primary Irrevocable: No at 75% and Collin Retzlaff as 25% primary Irrevocable: No beneficiary dated June 1st 2021. **(Exhibit C)**

III. Arguments

A. The beneficiary designation made by my late husband Thomas Retzlaff, designating me as the sole beneficiary, is valid and enforceable, as evidenced by our marriage and his expressed intentions. **(Exhibit B)**

B. The policy provisions **(Exhibit A)** on page 4, under **"The Beneficiary"** allows for changes to the beneficiary designation, without the Permission of beneficiaries and Thomas Retzlaff exercised this right to reflect his wishes accurately by listing all beneficiary's as Irrevocable: No on beneficiary designation change. **(Exhibit C)**

C. **(Exhibit F)** show **emails sent from Thomas Retzlaff** to me via email dated June 22nd 2021 that expressed fears for his life and his urgency in getting married to ensure my financial security and mine alone. These communications reflect Thomas' intentions regarding the beneficiary designation and his desire to protect my interests

F. **(Exhibit D)** I have screenshots of text messages sent from Thomas to me (Tayjalaya) dated August 8th 2021, **just 24 days before** Thomas' passing, where Thomas Retzlaff expressed concerns about harassment towards me and my family, attributing it to Collin (his son), who was listed as a 25% beneficiary in the second to last designation change and states me (Tayjalaya) at 75% on June 1st, 2021 **(Exhibit C)**. Thomas described **Collin Retzlaff** as **"NUTS"** and **acknowledged ongoing harassment issues caused by Collin and his associates.**

G. **Irrelevance of Other Claimants:** Brittany Retzlaff was removed as a beneficiary on **November 10, 2020**, and Denise Hollas on **June 1st 2021**, prior to Thomas's passing on **September 1st 2021**. Therefore, their claims are irrelevant and should **not** be considered in the proceedings

H. Upon contacting the El Mirage police department on March 11th 2024 to seek clarity and understanding regarding this matter seeing to me Being the “prime suspect “ this information was entirely new news to me. Upon querying Detective Vanorski for clarification, he appeared confused and denied labeling me as a prime suspect. He suggested that for further clarification, **the court or judge may contact him directly at 623-500-3035. Regarding the allegation of being a prime suspect, I refute this claim entirely. There is no basis for such an accusation, and I have never been involved in any criminal activity.**

IV. Affirmative Defenses

A. I maintain innocence and have not been formally charged or convicted in connection with Thomas Retzlaff's homicide.

B. I assert my right to receive 100% of the policy benefits as designated by Thomas Retzlaff.

V. Request for Relief

A. Adjudication: Honor the most recent beneficiary designation naming me as the 100% beneficiary.

B. Exclusion of Irrelevant Claims: Disregard the claims made by Brittany Retzlaff and Denise Hollas, as they are irrelevant to the proceedings.

C. Request for Bench Trial: I request a bench trial to ensure a fair and impartial resolution of this matter.

VI. Conclusion

- In conclusion, Given that I am representing myself in this matter due to financial constraints, I apologize for any deviations from formal legal conventions. I urge the Court to consider the evidence presented and uphold the most recent beneficiary designation, made by my late husband Thomas Retzlaff's explicit intentions. Given the emotional strain and complexity involved, I seek a swift and fair adjudication to avoid unnecessary delay and protract The exclusion of irrelevant claims and the request for a bench trial will ensure a fair and just resolution of this matter. I thank the Court for its attention to this matter and respectfully submit this response for its consideration. Should the Court require further information or clarification, I am readily available to provide.

Please acknowledge receipt of this response and inform me of any further actions required on my part.

Sincerely,

Tayjalaya S. Williams

Defendant
